

1 M. KIRBY C. WILCOX (SB# 078576) kirbywilcox@paulhastings.com  
2 THOMAS E. GEIDT (SB# 080955) tomgeidt@paulhastings.com  
3 MOLLY A. HARCOS (SB# 233556) mollyharcos@paulhastings.com  
4 ANDREA M. LINDEMANN (SB# 244937) andrealindemann@paulhastings.com  
5 PAUL, HASTINGS, JANOFSKY & WALKER LLP  
6 55 Second Street  
7 Twenty-Fourth Floor  
8 San Francisco, CA 94105-3441  
9 Telephone: (415) 856-7000  
10 Facsimile: (415) 856-7100

11 Attorneys for Defendant  
12 CADENCE DESIGN SYSTEMS, INC.

13 UNITED STATES DISTRICT COURT  
14  
15 NORTHERN DISTRICT OF CALIFORNIA  
16  
17 SAN FRANCISCO DIVISION  
18

19 AHMED HIGAZI, on behalf of himself  
20 and a class of those similarly situated,

21 Plaintiff,

22 vs.

23 CADENCE DESIGN SYSTEMS, INC.,

24 Defendant.

CASE NO. 3:07-CV-02813 BZ

**DEFENDANT'S NOTICE OF MOTION  
AND MOTION FOR INTRADISTRICT  
VENUE TRANSFER**

Date: August 22, 2007  
Time: 10:00 a.m.  
Ct. Rm.: G, 14th Fl.  
Judge: Hon. Bernard Zimmerman

[LOCAL RULE 3-2]

1 TO PLAINTIFF AHMED HIGAZI AND HIS ATTORNEYS OF RECORD:

2  
3 PLEASE TAKE NOTICE that on Wednesday, August 22, 2007, at 10:00 a.m., or as soon  
4 thereafter as the matter may be heard, in Courtroom G of this Court, located at 450 Golden Gate  
5 Avenue, 14th Floor, San Francisco, California, before the Honorable Bernard Zimmerman,  
6 defendant Cadence Design Systems, Inc. ("Cadence"), will and does move this Court, pursuant to  
7 Local Rule 3-2 and 28 U.S.C. section 1404(a), to transfer venue of this action from the San  
8 Francisco Division of the Northern District of California to the San Jose Division.

9  
10 This motion is made on the grounds that the action arises in the San Jose Division and the  
11 convenience of the parties and witnesses and the interest of justice would be served by changing  
12 the venue of this action to the San Jose Division, where Plaintiff worked for Cadence, where  
13 Cadence is located, where the witnesses and records relevant to Plaintiff's claims are located, and  
14 where most of the putative class members are employed.

15 This motion is based upon this notice, the accompanying memorandum of points and  
16 authorities, the Declarations of Denise Mooradian, Kanishka de Lanerolle, and Cheryl Sweazy-  
17 Root, the Court's records and files of this action, and such evidence and argument as may be  
18 presented at the hearing on the motion.

19  
20 DATED: June 28, 2007

THOMAS E. GEIDT  
PAUL, HASTINGS, JANOFSKY & WALKER LLP

21  
22  
23 By: /s/  
THOMAS E. GEIDT

24 Attorneys for Defendant  
25 CADENCE DESIGN SYSTEMS, INC.  
26  
27  
28